UNITED STATES DISTRICT COURT EASTERN DISTRICT OF VIRGINIA

Norfolk Division

FLAME S.A.,

Plaintiff,

GLORY WEALTH SHIPPING PTE LTD.,

Consolidated Plaintiff,

٧.

INDUSTRIAL CARRIERS, INC.,

VISTA SHIPPING, INC., and

FREIGHT BULK PTE. LTD., and VIKTOR BARANSKIY,

Defendants.

Civil Action No.

2:13-cv-00658-RGD-LRL

2:13-cv-00704-RGD-LRL

DECLARATION OF WILLIAM R. BENNETT, III, ESQ.

- I, William R. Bennett, III, Esq., declare under the penalty of perjury that the following is true and correct:
 - 1. Pursuant to the Court's February 28 2014 Order (Dkt. # 88) setting a bar date for cargo owner and charterer to intervene in the referenced matter, the undersigned and local counsel for Flame S.A. did provide a copy of the Court's Order to counsel representing Vitol S.A. (cargo owner) and to the chartering department of Noble, Inc. (charterer) via email.
 - 2. A copy of the emails to Vitol's counsel and Noble's chartering department are attached hereto.

Dated: New York, New York March 6, 2014

William R. Bennett

William R. Bennett, III

CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of March, 2014, I electronically filed a true and correct copy of the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such electronic filing to the following counsel of record:

Patrick M. Brogan DAVEY & BROGAN, P.C. 101 Granby Street, Suite 300 Norfolk, Virginia 23510 Tel: (757) 622-0100 Fax: (757) 622-4924

Email: <u>pbrogan@daveybroganpc.com</u>
Attorney for Defendant Freight Bulk PTE, LTD.

George M. Chalos (pro hac vice)
CHALOS & CO., P.C.
55 Hamilton Avenue
Oyster Bay, New York 11771
Tel: (516) 7 14-4300
Fax: (516) 750-9051

Email: gmc@chaloslaw.com
Attorney for Defendant Freight Bulk PTE, LTD.

Michelle Hess (VSB No. 71080)
HOLLAND & KNIGHT, LLP
1600 Tysons Blvd, Suite 700
McLean, VA 22102
Tel: (703) 720-8600
Fax: (703) 720-8610

Email: michelle.hess@hklaw.com
Attorney for Consolidated Plaintiff
Glory Wealth Shipping Pte Ltd.

James H. Power (pro hac vice)
HOLLAND & KNIGHT, LLP
31 West 52nd Street,
New York, NY 10019
Tel: (212)513-3200
Fax: (212)385-9010

Email: James.power@hklaw.com
Attorney for Consolidated Plaintiff
Glory Wealth Shipping Pte Ltd.

/s/ Steven M. Stancliff

Steven M. Stancliff, VSB No. 73853

Attorney for Plaintiff Flame S.A.

CRENSHAW, WARE & MARTIN, P.L.C.
150 W. Main Street, Suite 1500

Norfolk, VA 23510

Tel: (757) 623-3000

Fax: (757) 623-5000 sstancliff@cwm-law.com